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December 21, 2007

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VIA FACSIMILE

Honorable Laura T. Swain
United States District Judge
United States District Court
Southern District of New York
500 Pearl Street
New York, New York 10007
Fax No.: 212-805-0426.

MEMO ENDORSED

07cv4615

Re: Double Happiness Shipping Company Limited v. Cosmotrade
Exports S.A. ex-156-(LTS)
Our Ref: 584-07/PJG

Dear Judge Swain:

We represent the Defendant Cosmotrade Exports in the captioned action and write, pursuant to the Court's Order of December 10, 2007, to report on the parties' effort to resolve the issue regarding our application for counter-security on an amicable basis. Before doing so, the undersigned would like to apologize for neglecting to transmit this letter yesterday which was an oversight on my part.

Regarding the application for counter-security, counsel for the Plaintiff, Double Happiness Shipping, has indicated that his client is not prepared to voluntarily post counter-security. In view of this, it would appear that we have no other option other than to make our application by way of formal motion.

In this respect, counsel have conferred and would jointly propose to the Court the following schedule on Cosmotrade's application for counter-security:

December 21, 2007

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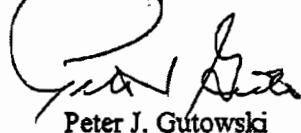
Motion papers in support of application for counter security
due January 18.

Opposition papers due February 1.

Reply papers due February 7.

Provided this schedule meets with the Court's approval, we will proceed on this basis and take the opportunity to wish the Court and opposing counsel a very Happy Holiday and Healthy 2008.

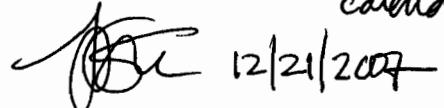
Respectfully submitted,
FREEHILL HOGAN & MAHAR, LLP



Peter J. Gutowski

cc: Blank Rome LLP
Attn: Thomas H. Belknap, Jr., Esq.
Via Email

The proposed briefing schedule is approved. Happy Holidays to all. The Clerk of Court is requested to restore this matter to so ordered. The active calendar.

 12/21/2007